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FILED  
SEP 16 2022  
CLERK OF COURT  
ALLEGHENY COUNTY PA

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA, CRIMINAL DIVISION

v.

CC No.: 2012 02820

THADDEUS THOMAS CRUMBLEY,  
Defendant.

THE HONORABLE BETH LAZZARA

**POST-VERDICT MOTION:  
MOTION FOR EXTRAORDINARY  
RELIEF**

Filed on Behalf of Defendant:

Thaddeus Thomas Crumbley

Counsel of Record for this Party:

Wendy L. Williams  
PA ID# 50379

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Pittsburgh, PA 15219

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FILED

2012 SEP 14 PM 3:02

DEPT OF COURT RECORDS  
CRIMINAL DIVISION  
ALLEGHENY COUNTY PA

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

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Defendant.

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**MOTION FOR EXTRAORDINARY RELIEF**

AND NOW, comes the Defendant, Thaddeus Crumbley, by and through his attorney, Wendy L. Williams, and avers the following:

1. The Prosecution in this case acted improperly and with extreme prejudice by making biblical reference to the Defendant as "The Angel of Death" in his closing while gesturing in close proximity to the Defendant.
2. Counsel for Defendant did not object or ask for a mistrial or cautionary instruction to what amounted to prosecutorial misconduct.
3. There was insufficient evidence to convict the Defendant. The verdict was against the weight of the evidence.
4. The Defendant was prevented from having a fair trial because he was not provided with full discovery, including critical identification procedures and photo arrays used in the investigation against him. The Commonwealth provided the Defendant with some well after the pretrial motions on said evidence was heard and late in the trial.
5. Commonwealth witnesses and detectives testified about photographs and photos being shown and introduced a new photo array in which the Defendant was not identified.
6. This exculpatory evidence was not given to the Defendant in a timely manner.
7. The Commonwealth withheld critical evidence and discovery information that prevented the Defendant from receiving a fair trial.

WHEREFORE, based on the within reasons the Defendant requests that Extraordinary Relief/a new trial be granted forthwith.

Respectfully Submitted

A handwritten signature in black ink, appearing to be 'W.L. Williams', written over a horizontal line.

Wendy L. Williams

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COMMONWEALTH OF PENNSYLVANIA, CRIMINAL DIVISION

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CC No.: 2012 02820

THADDEUS THOMAS CRUMBLEY,  
Defendant.

**PRELIMINARY ORDER OF COURT**

AND NOW, to-wit, upon consideration of the foregoing Motion for Extraordinary Relief  
it is hereby ORDERED, ADJUDGED and DECREED that a hearing be held on the \_\_\_\_\_ day  
of \_\_\_\_\_, 2012 at \_\_\_\_\_ A.M./P.M.

BY THE COURT:

\_\_\_\_\_, J.

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

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THADDEUS THOMAS CRUMBLEY,  
Defendant.

THE HONORABLE BETH LAZZARA

**ORDER OF COURT**

AND NOW, to-wit, this \_\_\_\_\_ day of \_\_\_\_\_, 2012, it is hereby  
ORDERED , ADJUDGED, AND DECREED that the Motion for Extraordinary Relief on the  
above captioned case is hereby:

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BY THE COURT:

\_\_\_\_\_, J.

**CERTIFICATE OF SERVICE**

I, Wendy L. Williams, hereby certify that a true and correct copy of the within Motion for Extraordinary Relief was served in the manner indicated, this 14<sup>th</sup> day of September, 2012 upon the following:

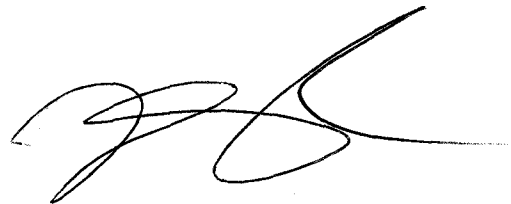
The Honorable Beth Lazzara  
510 Allegheny County Courthouse  
436 Grant Street  
Pittsburgh, PA 15219  
Via Hand Delivery

DDA Steven Stadtmiller  
c/o Allegheny County District Attorney's Office  
401 Allegheny County Courthouse  
436 Grant Street  
Pittsburgh, PA 15219  
sstadtmiller@da.allegheny.pa.us  
Via Hand Delivery and Email

Helen Lynch, Court Administrator  
Allegheny County Courthouse  
436 Grant Street  
Pittsburgh, PA 15219  
Via Hand Delivery

Randall McKinney, Esquire  
c/o Allegheny County Conflict Counsel  
429 Forbes Avenue, Suite 1400  
Pittsburgh, PA 15219  
Via U.S. Mail

Mr. Thaddeus Thomas Crumbley, DOC# 69038  
c/o Allegheny County Jail  
950 2nd Avenue  
Pittsburgh, PA 15219  
Via U.S. Mail



Wendy L. Williams